

Kenneth R. Puhala (KP-8104)
SCHNADER HARRISON SEGAL & LEWIS LLP
140 Broadway, Suite 3100
New York, New York 10005-1101
(212) 973-8000
(212) 972-8798 (fax)
Attorneys for Defendant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JOEL S. ARIOS, in his official capacity as
Acting Insurance Commissioner of the
Commonwealth of Pennsylvania, as statutory
Liquidator of RELIANCE INSURANCE
COMPANY (IN LIQUIDATION)
1311 Strawberry Square
Harrisburg, Pennsylvania 17120

Plaintiff,

Civil Action No.: 07-CV-7454 (LTS)

v.

CONSTITUTION STATE SERVICES, LLC
f/k/a CONSTITUTION STATE SERVICE
COMPANY
c/o Travelers Indemnity Co.
One Tower Square 5 MN
Hartford, Connecticut 06183

Defendant.

U.S. DISTRICT COURT
FILED
2007 OCT 18 PM 2:16
S.D. OF N.Y.

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for
the Southern and Eastern Districts of New York, I, Kenneth R. Puhala, a member in good
standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice
of:

40-925-62098 OCT 18 2007

Wilbur L. Kipnes
Schnader Harrison Segal & Lewis LLP
1600 Market Street, Suite 3600
Philadelphia, PA 19103-7286
Telephone: 215-751-2000
Facsimile: 215-751-2205

Wilbur L. Kipnes is a member in good standing of the Bar of the State of Pennsylvania.

There are no pending disciplinary proceedings against Wilbur L. Kipnes in any State or Federal Court.

Dated: New York, New York
October 18, 2007

SCHNADER HARRISON SEGAL &
LEWIS LLP

By: 
Kenneth R. Puhala (KP-8104)
140 Broadway, Suite 3100
New York, New York 10005
(212) 973-8000
(212) 972-8798 (fax)
Attorneys for Defendant

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
 JOEL S. ARIOS, in his official capacity as
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1311 Strawberry Square
Harrisburg, Pennsylvania 17120
Plaintiff, : Civil Action No.: 07-CV-7454 (LTS)
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COMPANY
c/o Travelers Indemnity Co.
One Tower Square 5 MN
Hartford, Connecticut 06183
Defendant.
 -----x

**DECLARATION OF KENNETH R. PUHALA IN SUPPORT
OF APPLICATION FOR ADMISSION *PRO HAC VICE*
OF WILBUR L. KIPNES**

Kenneth R. Puhala, an attorney admitted to practice before this Court, declares the following:

1. I am a partner at SCHNADER HARRISON SEGAL & LEWIS LLP, counsel for Defendant, Constitution State Services, LLC f/k/a Constitution State Service Company.
2. I submit this Declaration in support of the application for admission *pro hac vice* to the bar of the United States District Court for the Southern District of New York of Wilbur L. Kipnes. If admitted, Mr. Kipnes will serve as co-counsel for Defendant.

3. Mr. Kipnes is a partner at SCHNADER HARRISON SEGAL & LEWIS LLP. Mr. Kipnes maintains an office at 1600 Market Street, Suite 3600, Philadelphia, Pennsylvania 19103-7286.

4. Mr. Kipnes was admitted to practice before the courts in the following jurisdictions on the dates set forth below:

Supreme Court of Pennsylvania, October 1974.

A Certificate of Good Standing is attached hereto.

5. I have found Mr. Kipnes to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move for the admission of Wilbur L. Kipnes, *pro hac vice*.

7. I respectfully submit a proposed order granting the admission of Wilbur L. Kipnes, *pro hac vice*, which is attached hereto as Exhibit A.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct.

Dated: New York, New York
October 18, 2007

SCHNADER HARRISON SEGAL & LEWIS LLP

By: _____


Kenneth R. Puhala (KP-8104)
140 Broadway, Suite 3100
New York, New York 10005
(212) 973-8000
(212) 972-8798 (fax)
Attorneys for Defendant



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Wilbur L. Kipnes, Esq.

DATE OF ADMISSION

October 17, 1974

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal
Dated: October 5, 2007,

Patricia A. Johnson
Patricia A. Johnson
Chief Clerk

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----x
JOEL S. ARIOS, in his official capacity as
Acting Insurance Commissioner of the
Commonwealth of Pennsylvania, as statutory
Liquidator of RELIANCE INSURANCE
COMPANY (IN LIQUIDATION)
1311 Strawberry Square
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Plaintiff,

v.

CONSTITUTION STATE SERVICES, LLC
f/k/a CONSTITUTION STATE SERVICE
COMPANY
c/o Travelers Indemnity Co.
One Tower Square 5 MN
Hartford, Connecticut 06183

Defendant.

-----x
**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Kenneth R. Puhala, counsel for Defendant, Constitution State Services, LLC f/k/a Constitution State Service Company and said sponsor attorney's declaration in support;

IT IS HEREBY ORDERED that

Wilbur L. Kipnes
Schnader Harrison Segal & Lewis LLP
1600 Market Street, Suite 3600
Philadelphia, PA 19103-7286
Telephone: 215-751-2000
Facsimile: 215-751-2205
wkipnes@schnader.com

is admitted to practice *pro hac vice* as counsel for Defendant, Constitution State Services, LLC f/k/a Constitution State Service Company in the above captioned case in the United States District Court for the Southern District of New York . All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of

attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the *pro hac vice* fee to the Clerk of Court.

Dated: New York, New York
October ___, 2007

United States District Judge

AFFIDAVIT OF SERVICE

STATE OF NEW YORK)
)
) ss.:
COUNTY OF NEW YORK)

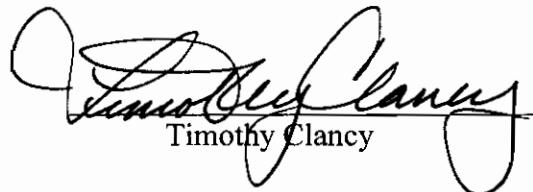
Timothy Clancy, being duly sworn, deposes and says, deponent is not a party to this action, is over eighteen (18) years of age and resides in Monmouth County, New Jersey.

On October 18, 2007, I served a true copy of the attached MOTION TO ADMIT COUNSEL PRO HAC VICE, with accompanying documents, upon:

John A. Wait, Esq.
FOX ROTHSCHILD LLP
100 Park Avenue
Suite 1500
New York, New York 10017

Gerard E. Arth, Esq.
Cheryl A. Garber, Esq.
FOX ROTHSCHILD LLP
2000 Market Street, Tenth Floor
Philadelphia, Pennsylvania 19103

by First Class Mail.



Timothy Clancy

Sworn to before me this
18th day of October, 2007

Patricia J. Kehlenbeck
Notary Public

PATRICIA J. KEHLENBECK
Notary Public, State of New York
No. 01KE6037739
Qualified in Nassau County
Commission Expires February 28, 2010